

1 Scott S. Thomas, NV Bar No. 7937  
2 [sst@paynefears.com](mailto:sst@paynefears.com)  
3 Sarah J. Odia, NV Bar No. 11053  
4 [sjo@paynefears.com](mailto:sjo@paynefears.com)  
5 PAYNE & FEARS LLP  
6 6385 S. Rainbow Blvd., Suite 220  
7 Las Vegas, Nevada 89118  
8 Telephone: (702) 851-0300  
9 Facsimile: (702) 851-0315  
10 *Attorneys for Capitol Specialty Insurance  
11 Corporation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CAPITOL SPECIALTY INSURANCE  
CORPORATION, a Wisconsin corporation,  
as assignee of UNITED CONSTRUCTION  
COMPANY.

**Plaintiff,**

V.

STEADFAST INSURANCE COMPANY, a Delaware corporation; ARCH SPECIALTY INSURANCE COMPANY, a Missouri Corporation; and RHP MECHANICAL SYSTEMS, a Nevada corporation, STATE NATIONAL INSURANCE COMPANY, INC., a Texas corporation; and AXIS SURPLUS INSURANCE COMPANY, an Illinois corporation,

## Defendants.

Case No.: 2:20-cv-1382-JCM-VCF

**CAPITOL SPECIALTY INSURANCE  
CORPORATION AND STEADFAST  
INSURANCE COMPANY'S JOINT  
UNOPPOSED MOTION TO EXTEND  
THE TIME FOR CAPITOL SPECIALTY  
TO FILE A REPLY IN SUPPORT OF ITS  
MOTION TO COMPEL (ECF No. 58)**

## [FIRST REQUEST]

Plaintiff CAPITOL SPECIALTY INSURANCE CORPORATION (“CapSpecialty”), and Defendant STEADFAST INSURANCE COMPANY (“Steadfast,” and together with Capitol Specialty, the “Parties”), by and through their counsel, jointly move this Court to extend the deadline for CapSpecialty to file a reply in support of its Motion to Compel Steadfast to Produce Documents [ECF No. 58] (the “Motion”) filed on August 26, 2021. CapSpecialty’s Reply brief is currently due on September 16, 2021, and the Parties request that the Court move the deadline by one-week to

1 **September 23, 2021.** This is the Parties' first request to extend a deadline associated with  
 2 CapSpecialty's Motion.

3       The Parties seek to extend the deadline based on the current workloads and litigations  
 4 calendars of counsel for CapSpecialty. Specifically, counsel for CapSpecialty has a deposition  
 5 scheduled out of state on September 16, and needs time to prepare for the deposition from September  
 6 13 through 15, and will not have time to prepare a reply brief during that time period. No hearing has  
 7 been set on CapSpecialty's Motion and no party will be prejudiced by the brief extension being jointly  
 8 sought.

9       Accordingly, the Parties request that this Court extend the deadline for CapSpecialty to file a  
 10 Reply in Support of its Motion to Compel Steadfast to Produce Documents to September 23, 2021.

Dated: September 13, 2021	Dated: September 13, 2021
PAYNE & FEARS LLP	MORALES FIERRO & REEVES
By: <u>/s/ Sarah J. Odia</u>	By: <u>/s/ Ramiro Morales</u>
Scott S. Thomas, Esq. Sarah J. Odia, Esq. 6385 S. Rainbow Blvd., Suite 220 Las Vegas, Nevada 89118	Ramiro Morales, Esq. 600 Tonopah Drive, Suite 300 Las Vegas, Nevada 89106
Attorneys for Plaintiff CAPITOL SPECIALTY INSURANCE CORPORATION	Attorneys for Defendant STEADFAST INSURANCE CORPORATION

19  
 20 **ORDER**

21 IT IS SO ORDERED:

22 DATED: 9-15-2021

23   
 UNITED STATES MAGISTRATE JUDGE